

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE AMERICAN INTERNATIONAL
GROUP, INC. SECURITIES LITIGATION

This Document Relates To: All Actions

$$\begin{matrix} \mathbf{X} & & & & & & & & & \\ & \cdot & & & & & & & & \\ & \cdot & & & & & & & & \\ & & \cdot & & & & & & & \\ & & \cdot & & & & & & & \\ & & & \cdot & & & & & & \\ & & & \cdot & & & & & & \\ & & & & \cdot & & & & & \\ & & & & \cdot & & & & & \\ & & & & & \cdot & & & & \\ & & & & & & \cdot & & & \\ & & & & & & & \cdot & & \\ & & & & & & & & \cdot & \\ & & & & & & & & & \mathbf{X} \end{matrix}$$

ECF CASE

Master File No. 04 Civ. 8141 (JES) (AJP)

Oral Argument Requested

**DECLARATION OF ZACHARY M. RATZMAN IN SUPPORT OF
LEAD PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

ZACHARY M. RATZMAN declares as follows pursuant to 28 U.S.C. § 1746:

1. I am of counsel to the law firm of Labaton Sucharow LLP, Court-appointed Co-Lead Counsel for the Ohio Public Employees Retirement System (“OPERS”), State Teachers Retirement System of Ohio (“STRS Ohio”), and the Ohio Police & Fire Pension Fund (“OP&F”) (collectively, “Lead Plaintiff” or the “Ohio State Funds”) in the above-titled action.

2. I am admitted to practice before this Court and the courts of the State of New York, and respectfully submit this declaration in support of Lead Plaintiff's motion for class certification.

3. Annexed hereto as Exhibit 1 is a true and correct copy of cited excerpts from the transcript of the April 20, 2006 hearing on defendants' motions to dismiss.

4. Annexed hereto as Exhibit 2 is the Declaration of John D. Finnerty, Ph.D. In Support of Lead Plaintiff's Motion for Class Certification.

5. Annexed hereto as Exhibit 3 is Lead Plaintiff's August 24, 2007 Amended Responses and Objections to Defendant General Reinsurance Corporation's First Set of Interrogatories to Lead Plaintiff Ohio Public Employees Retirement System, State Teachers Retirement System of Ohio, and Ohio Police & Fire Pension Fund.

6. Annexed hereto as Exhibit 4 is a true and correct copy of an excerpt from AIG's September 30, 2004 Form 10-Q.

7. Annexed hereto as Exhibit 5 is a true and correct copy of a Bloomberg report of daily trading information for AIG common stock between October 28, 1999 and April 1, 2005.

8. Annexed hereto as Exhibit 6 is a true and correct copy of Defendant American International Group, Inc.'s Responses and Objections to Plaintiff's First Set of Interrogatories.

9. Annexed hereto as Exhibit 7 is a true and correct copy of Defendant Merrill Lynch & Co.'s Objections and Responses to Lead Plaintiff's First Set of Interrogatories.

10. Annexed hereto as Exhibit 8 is a true and correct copy of Defendant Wachovia Securities, Inc.'s Objections and Responses to Lead Plaintiff's First Set of Interrogatories.

11. Annexed hereto as Exhibit 9 are true and correct copies of trade confirmations reflecting OPERS' purchases of AIG 4.25% Notes, due May 15, 2013.

12. Annexed hereto as Exhibit 10 is a true and correct copy of cited excerpts from the transcript of the April 20, 2006 hearing on defendants' motions to dismiss.

13. Annexed hereto as Exhibit 11 is the firm resume of Labaton Sucharow LLP ("Labaton Sucharow").

14. Annexed hereto as Exhibit 12 is the firm resume of Hahn Loeser & Parks LLP ("Hahn Loeser").

15. Annexed hereto as Exhibit 13 is a true and correct copy of the December 14, 2004 certification of OPERS, filed with the Court on December 14, 2004.

16. Annexed hereto as Exhibit 14 is a true and correct copy of the December 12, 2006 amended certification of OPERS, filed with the Court on December 15, 2006.

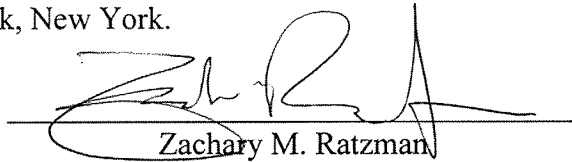
17. Annexed hereto as Exhibit 15 is a true and correct copy of the December 12, 2006 amended certification of STRS Ohio, filed with the Court on December 15, 2006.

18. Annexed hereto as Exhibit 16 is a true and correct copy of the December 12, 2006 amended certification of OP&F, filed with the Court on December 15, 2006.

19. Annexed hereto as Exhibit 17 is a true and correct copy of the February 7, 2005 Order appointing the Ohio State Funds as Lead Plaintiff and Labaton Sucharow and Hahn Loeser as Co-Lead Counsel.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 20, 2008, at New York, New York.



Zachary M. Ratzman